



BellSouth Telecommunications, Inc.
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

joelle.phillips@bellsouth.com

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REGULATORY AUTH.

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OFFICE OF THE
EXECUTIVE SECRETARY
December 5, 2001

Joelle J. Phillips
Attorney

615 214 6311
Fax 615 214 7406

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: *In the matter of Rulemaking Amendment of Regulations for Telephone
Service Providers*
Docket No. 00-00873

Dear Mr. Waddell:

As initially stated in BellSouth's comments dated October 26, 2001 and reiterated herein, BellSouth urges the Authority to either implement the proposed regulations as revised and submitted by the Industry or grant an evidentiary hearing.

The proposed amendments to the service standards represent the first substantive changes to such rules in 20 years. Any such changes will result in significant modifications to the way that telecommunications companies operate in Tennessee. These modifications will introduce additional one time and ongoing costs to the industry that will ultimately be borne by the customers of the impacted companies. In addition, further development of competition could be negatively impacted by rules that are onerous, burdensome, and unnecessary. For all these reasons, it is imperative for the TRA and the industry use every available resource to implement appropriate rules that effectively safeguard the consumer while fostering an atmosphere that encourages investment and competition.

An evidentiary hearing would provide the TRA the opportunity for scrutiny of the factual basis for the standards proposed by the TRA Staff. Furthermore, evidence could also be presented to determine the actual performance level in existence in 1995. The knowledge thus gained will provide a sound factual basis on which the TRA can base its ultimate decision.

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Realistically, given the present schedule of hearings and related activities, BellSouth suggests that a hearing on this matter could be efficiently conducted in the February 2002 time frame. Thank you in advance for consideration of this matter.

Cordially,



Joelle Phillips

JP/jej

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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James Lamoureux, Esquire
Richard Guepe
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

James Wright, Esq.
Laura Sykora, Esq.
Kaye Odum, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street, #100
Nashville, TN 37201

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Susan Berlin, Esquire
MCI Worldcom, Inc.
Six Concourse Pkwy, #3200
Atlanta, GA 30328

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

John B. Adams
Citizens Communications
250 S. Franklin St.
Cookeville, TN 38501

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Bruce H. Mottern
TDS Telecom
P. O. Box 22995
Knoxville, TN 37933-0995

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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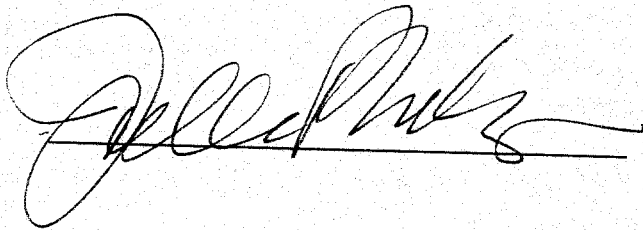
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Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219

Timothy Phillips, Esquire
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, Tennessee 37202

Andrew O. Isar, Esquire
ASCENT
3220 Uddenberg Lane N W
Gig Harbor, WA 98335

Dale Grimes, Esquire
Bass, Berry & Sims, PLC
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238

A handwritten signature in dark ink, appearing to read "Timothy Phillips", written over a horizontal line.